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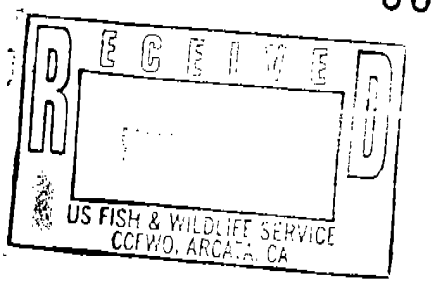

November 15, 1998
725 Patrick Ct.
Arcata, Calif. 95521

Bruce Halstead
US Fish and Wildlife Service
1125 16th. St., Room 209
Arcata, Calif. 95521

Dear Sir:

I attended part of the public hearings on Pacific Lumber Company's (PL) proposed Sustained Yield Plan/Habitat Conservation Plan (SYP/HCP) in Eureka, November 10. 1998. I found the comments made by each speaker quite interesting. I have read a good portion of the six volume public review draft of the plan. It has reminded me of an old saying which my father used to use: "It all depends on who's ox is being gored."

I am 47 years old and came here with my family in 1951, before my first birthday. For practical purposes I have lived here ever since. I like it here very much and hope that I will never be forced to leave. I attended local schools. The fathers of many of my school mates worked in the timber industry. Later many of my school mates did so also. While not working directly in the lumber industry I myself have worked at least on the periphery in several jobs including as a carpenter. Many of my friends and acquaintances work or have worked in the industry. I now work locally as a landlord and pay taxes. I have an eight year old son whom I would like to see be able to live in this wonderful place too, if he so chooses. I love the place in which I live, the forest, the beach, the rivers, and the friendly people, and would not want anything to ruin it.

I grew up playing in second growth redwood forest and have followed the debate about the forests, the birds, and the fish with much personal interest for much longer than the current controversy. I want you to have, for whatever it is worth, the benefit of my perspective.

At the public hearing I heard my neighbors and others say many things. On the one hand I heard that the SYP/HCP is "Good Science", that we need jobs, that we need to pay attention to the human species too, one fellow talked about working on the plan himself and how much work had gone into it and how the restrictions as proposed are going to be difficult and expensive to implement. On the other hand, those who spoke in opposition to the plan, I believe, were probably not long term residents of Humboldt County. I believe also that this latter group probably do not have jobs here; otherwise how can they spend so much time protesting. These latter talked about the plan not being good

science, and not giving sufficent protection to the ecosystem, one even sang a song ("This Land is Your Land, this Land is My Land", by Woody Guthrie), afterward they drumed and chanted outside.

There are a number of subjects upon which I want to give my opinions. I also will offer you what I hope is a better proposal for the LTSY plan.

1. "The Timber War".

This "timber war" that we are in would not, I believe, have happened without outside agitators. We could not, I believe, have made the corrections ourselves and the regulatory agencies' personnel have been obviously insufficently effective.

Loggers and other timber industry people are, for the most part: some of the hardest working people around; tax payers; trying to raise their families, and be good citizens. They deserve respect and we as a society should make sure that they are not harmed by this process. The people I have known who worked in the woods loved the forest and even though it may seem contradictory, they may very well have taken falling jobs so that they could be out in nature; they may very well know and love the forest more than people from the city who want the trees saved so that they can come here and camp for a few days once in a great while. Any, agreement which does not include sufficent support for economic displacement of these people would be deficient and extremely unfortunate.

If we as a society had decided not to disrupt the ecosystem then we could not have been a part of it. But, we are a part of it. The main problems with timber harvesting as it has been practiced, in my view, are over harvesting, a conversion to short rotation industrial forest management, and significant collateral damage to the ecosystem. We as a society of the species Homo sapiens have learned quite a bit about how to treat the forest and have improved our logging practices over time as we have learned more. Growing up here, I heard many stories form the old timers about how it used to be (eg: they thought that we would never run out of old growth; that LP was a cut and run outfit but that Simpson was in it for the long haul; that the deer were pleniful, the fishing superb; etc.). I have seen the result of the poor logging practices of the past and I have seen the forest regrow and be cut again. Each generation has had more regulation and for the most part each generation longs for the relative freedom of the past while at the same time lamenting the poor logging practices of the past. You can see this in the present controversy. Witness, people who would have never considered the present the plan as reasonable before, are now touting it as "good science" and are now willing to accept more regulation when not long ago it was said that there was no problem and that they were being overly regulated. Why the change? We as a society have been forced to realize that we have not been doing a good enough job because if it is "good science" today then why wasn't it "good science" yesterday. We are still learning and need to be able to modify our practices as we learn more and as problems, with any plan, such as errors or loopholes are found. Does this mean a continuation of the "Timber Wars"? It does not have to, I believe, as the real and ligitimate concern of the people in the timber industry is not regulatory stability but economic stability which I will address below.

2. Jobs.

When I was young I heard people of my parent's generation (raised during the "Great Depression") and others of my Grandparent's generation (raised before automoblies, before airplanes) talk about automation. Automation, I believe, has taken more timber jobs than any other cause. But, I would bet that these protesters who like to make this claim would not want a job on one of the old greenchains; they would probably be too tired when they went home to do any protesting. However, the answer, I believe, is not in 'to automate or not to automate'; the answer to the present issue of jobs is for the society as a whole to take better care of its members (which is equally true in or out of the "timber wars"). We as a society, I believe, are cabable of organizing ourselves in way that will allow each member a stable economic base. In any case if we do not, I am afraid, we as a species face continuing internecine conflicts and some terrible times as the limits of the ecosystem make themselves felt through "natural" processes. The issues we are discussing with the plan are just part of the whole and if we solve the timber controversy we will have much work yet to be done before our society changes into a stable sustainable form. In any case, it is clear to me that, in the ultimate sense, the stability of the ecosystem is important; the fact that any single person has or does not have a job is not important.

3. Needs of the humans species.

When I was in the Peace Corps (Senegal) I asked a group of my village elders what their basic needs were, inorder to try to understand how I might better help. The answer was instructive and was delivered with much amusement: their basic needs were food, water, clothing and shelter. They recognized their basic needs; that which was needed to survive not only as individuals but as social units and genetic lines. In our society, our "rat race" is fueled by the need to possess ever more "stuff". Our aim should not be to provide that to which we have become accustomed at the expense of the environment. We as a society can choose to be satisfied with less. Indeed our notion of continual growth is, in biological terms, impossible and in the short term is sometimes called cancer and at other times imbalance. But, these expectations are social constructs and our preceived needs are modified by what we preceive as possible. We have the chance and the responsibility to mold our expections in a manner which will not significantly harm the ecosystem.

4. The SYP/HCP.

The intent of the agreement and the plan appears to be two fold:: PL's desire for "maximization of present net worth..." through the the stablization of the business using a "no surprises clause" and a 50 year Incidental Take Permit (ITP) as insurance; and the desire by the regulatory agencies and the controlling political powers to put, at least, a temporary end to the "timber wars" and shift the hard decisions to the next generation. There is, I believe, a better way to address these issues as I will propose below (8).

The plan is flawed. The plan is flawed not necessarily because of intent or lack of sincereity but at minimum and clearly because, as was noted over and over in the SYP/HCP itself, we just do not have the information to understand the ecosystem and make confident choices concerning it. This was put well in Vol. II, Part L, Habitat Guilds, page 1: "The practical consequence is that one finds oneself working on the edge of the ecological sciences,

where methods are still being developed and management goals are often unclear."; and, page 9: The data "do provide the most direct and unbiased information about the biotic communities on PALCO's lands." However, these data are "...incomplete and excessively variable." and "...can be misleading." It was also well stated in Vol. I, page 19: "To date there is no comprehensive survey of the distribution of anadromous fish within the bio-region; consequently, data to definitively determine fish distributions are not available." I may be wrong but it appeared from my reading that the biotic sampling was done only at points near rivers, creeks or streams. The examples of this lack of basic ecosystem information were numerous and pervasive thoughout the plan. The plan is also flawed because of the aim of PL to convert the forest not only to a 40-60 year rotation with 40-60 year old trees but also from mainly redwood to mainly Douglas Fir which is incredible; the basic conversion of the ecosystem. The obvious questions are: why should we lock ourselves into a 50 year ITP (which is so obvously just a carte blanche to ignore endangered species) when we may find significant information much sooner? We should not; why would we even consider allowing ecosystem conversion? We should not.

5. Lumber quality.

I have worked as a carpenter for a number of years and have helped with both remodel and repair work on existing structures as well as new construction. You will have a hard time finding someone in the building trades who will tell you that the lumber we buy today is as good as that which used to be available. Generally the older the building is the better the quality of lumber; this is obviously not the result of sustained yeild timber harvesting. What I decribe is progressive: what you find, generally, is that homes for instance built from the 1800's to approximately the 1940's are almost exclusively tight grain, rot resistant, high quality, "old growth" redwood; then as you look at houses built later you see more and more "fir" and gradually then "second growth" redwood and "second growth" "fir". This change is not just type, it is not just volume of wood fiber (as the timber industry measures lumber), what we see in carpentry is a clear deterioration of the quality of lumber.

Specifications for the structural capacities of different grades of lumber have been the same up until recently. The lumber quality was getting so bad that the industry was faced with not being able to supply the same grades of lumber. But, interestingly, since the industry could no longer provide the product as specified the grading system was changed; the standards were lowered. I am not a lumber grader but what might have been graded a #3 or "utility" Douglas fir 2x4 before might now be a #2 grade. So now we can still get #1 and #2 grade lumber thus giving the appearance of sustainable harvest but all the specification tables which tell us, for instance, the allowable span of a framing member, have had to be changed, altered to compensate for the lower quality lumber available. We used to buy "foundation grade redwood" now we are offered chemically treated sapwood instead. The lowering of standards and the changing of the specifications was a bit of subterfuge, I believe, to cover up the fact that our forests are not being harvested in a sustained manner. If it were otherwise then the quality of lumber would be sustained not merely the volume. This is not an irreversible trend as I will explain below.

8. A partial solution.

In general, my opinion is that we should only harvest old growth timber because it makes better quality lumber and it implies that it came from a healthier forest. Old growth timber, for the sake of the arguement, in the case of redwood, is perhaps 500-1000 years old. I define it thusly because the definition from the Forest Practice Rules, used in the plan for "late seral" trees is, I believe, basicly flawed. It is flawed because it does not take into consideration the quality of the lumber which results, not to mention the lack of information on the health of the ecosystem. If we had harvested timber on the basis of the implied 500-1000 year rotation from perhaps about 1875 we would probably not now be in this timber war. Too late. Now what?

But wait, it is not too late.

Old growth reforestation is not an impossiblity. I am not talking about total preservaiton, I am talking about economic forestry. In order to understand what I want to communicate to you, perhaps, I need to add that I am not talking about completeing the process in our lifetime; though I am definitely serious about starting now. Mathematicly old growth reforestation can be described as a progression of harvesting less timber volume than that which is grown. Gradually the trees in such a rotational system become older and of better quality on average. Critics will fairly point out that under such a proposal the harvest will progressively become less and less until it approaches zero; which is not what I propose. What I propose is setting an upper limit which would still provide lumber for our economic needs but which still leaves a significant stand of timber. Exactly where this balance should be set can not at present be defined for the same reasons that the proposed SYP/HCP is is flawed; lack of knowledge of the ecosystem. However, we can still move in what I believe to be the right direction while we await better scientific information.

My proposal:

The perameters for my proposal (the proposal) are as follows:

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A. The key is to limit each harvest to less than that which has grown since the last harvest. As the harvest percentage (%) decreases the ecosystem will be allowed to regenerate faster but the lower the harvest and thus the higher the burden on those people economicly depending on the harvest. The harvest volume will vary from site to site based on the site conditions (eg: growing conditions as well as other factors such as proximity to water courses). Over time, as measured after each successive harvest, with the limitation mentioned above, the timber stand volume will increase. I am including with these remarks a graph which I believe will help clarify the proposal and more specificly this first point.

B. the period of harvest would vary according to whatever factors are involved. The need to give the land a rest between harvests will be balanced by the fact that a harvest would never take more than the % (above) since the last harvest and therefore it would not be likely, for economic reasons, to harvest any given sub-area too often.

C. the length of time it will take until old growth timber is again harvested will vary with the percentage of the harvest. If the definition of old growth is 500 to 1000 years old then it will take at least that long, but in any case the average

.age of the timber stand will become progressively greater with time.

D. the quality of timber will vary by site conditions but will improve incrementally with time (eg: the growth rings, in general, will become progressively smaller, the rot resistance will improve, and defects such as knots will become fewer).

The graph, included, was developed for a ten acre parcel with a starting volume of approximately 175 MBM of harvestable timber, a site index of 2, a period between harvests of 25 years (which allows approimately each generation with an income source), a harvest of 80% of the growth since the last harvest and a mimimum harvest of 100 MBM per harvest. It is based on a conservation easement the full text of which is available to you by request.

The proposal does not cover all aspects of the issues under consideration but it would better answer many of the environmental concerns while still giving PL the business stability it desires. There is a multifacited difference between the proposal and that portion of the SYP which deals with harvest. First, it is more likely to give stability to timber harvests (which in turn would give stability to employment). Second, it would give the ecosystem a progressively better chance to naturally rectify many of the problems which we with our "good science" are understanding better but which we may never fully understand. Third, it would provide progressively better quality lumber which would help off set the lower volume of harvest on the business balance sheets of owners. Fourth, it does not require any person nor entity nor any generation to bear too heavy a burden for past errors of over harvesting. Fifth, it allows the ecosystem management to move in a better direction while waiting for the scientific information required to do better still.

I would welcome a FREIGHTS model evaluation of the proposal. I would like to know if in fact it is a valid approach and if it would work the way that I think it would.

II-NN-1

In conclusion, the plan seems to fit its apparent intent but does little to sufficently address concerns about the ecosystem as a whole. At least in the case of ecosystem conversion from redwood to Douglas Fir it is clearly contrary to those concerns. The plan would give PL business stability but does not address the real issue of what long term sustained yield should be. It appears to give PL a carte blanche to ignore endangered species. By default and lack of vision it accepts the volume of wood fiber, profit based industrial forestry model of desired timber production. We can do much better. I think the plan should be modified to:

a. provide sufficent economic help to any displaced workers.

b. provide for sufficent ongoing empirical ecosystem studies to commence on PL land.

c. give not more than a 10 year ITP.

d. not allow a conversion from redwood to Douglas Fir.

e. not allow a conversion to the standard industrial forestry 40-60 year harvest rotation.

I hope that you, and all of the people who are charged with making these decisions, will be inspired by a desire to leave the world a better place for our descendants. In your process I hope that you will seriously consider that "the short term" is not your next job evaluation, nor your retirement date, nor five years from now but 1000 years (a nice round number). It can be a truely

remarkable legacy to leave to our descentants.

As you give my thoughts fair consideration, I thank you for your consideration.

Sincerely,

POSTSCRIPT 1.

I have only the vaguest of ideas how the San Francisco peninsula looked four hundred years ago. It was "pristine" to be sure, the plants were all native, the people appearently lived in relative harmony with nature. People who come from a place such as San Francisco to tell us, locals what we are doing wrong should understand that there is preceived hypocracy which runs something like this: We despoiled our home but since you have not yet ruined your home we are now going to force you to leave your home so that we will have some place nice to go on vacation, oh, and yes, we'll take your water too.

We the local citizenry knew that the last of the unprotected old growth was being cut (we knew because of the deals which had been, effectively and at long last, struck with the creation and later the expansion of Redwood National Park). We knew that the forests had been cut too fast (we knew because the quality of lumber had progressive decreased). We knew that there were problems in our environment which we did not understand (we knew because we do not have rain and fog as we used to have; that the lamprey, the aquatic insects and frogs were disappearing from the streams, and the fish stocks were decreasing). Some of us, incredibly, were glad that the rain and fog had lessened, little understanding what that might mean in terms of the ecosystem as opposed to our own shortsighted desire for personal comfort. Some of us worked at figuring out how to fix the problems but were in the position of perhaps asking our friends and neighbors to sacrifice. In any case, in general, positive movement on environmental issues was slow at best. Then something changed. From my perspective perhaps the day that Darrel Cherny arrived here is the day it started to change.

We have been forced to see that what we thought was "good science" was not. We have been forced to understand that there is a bird called the Spotted Owl, another called the Marbled Murrelet, that there are torrent salamanders and red legged frogs all of which are important and need to be considered; that, indeed, the whole ecosystem needs to be considered. And, that our old ways of doing things were just not sufficent. We have no one to thank for this more than Darrel Cherney, the late Judy Barri, and a host of other people in Earth First! They have done an incredible job of bringing this issue to the public. My hat is off to Earth First! without which our society was adrift in a boat made of momentum and "time honored" (if just plain wrong) ways of doing things, the "good science" of the past. As I have noted, above, I do not believe that a person from some city loves trees more than someone who works in the timber industry. But, probably it was neccessary to have someone from the outside come and tell us that "the Emperor has no clothes".

POSTSCRIPT 2.

Errors: The plan has many what I believe to be editing errors. These range from incomplete map keys (eg: Map3), to inconsistent map scales, to inconsistent coverage of PL lands on maps (eg: Map 9), to incorrect text references to maps (eg: Vol. I, page 24), to incomplete lists of species in certain seral stages in Vol. II, Part M (?), to probable omissions of numerous life forms (eg: the ring-neck snake Diadophis?; Himalaya berry, Rubus discolor?; moss spp.?; lichen spp,?; bugs spp.?; insects spp.?) again Vol. II, Part M (?); additionally there was a text reference to the "Shively" watershed, did I miss it on Map 3?

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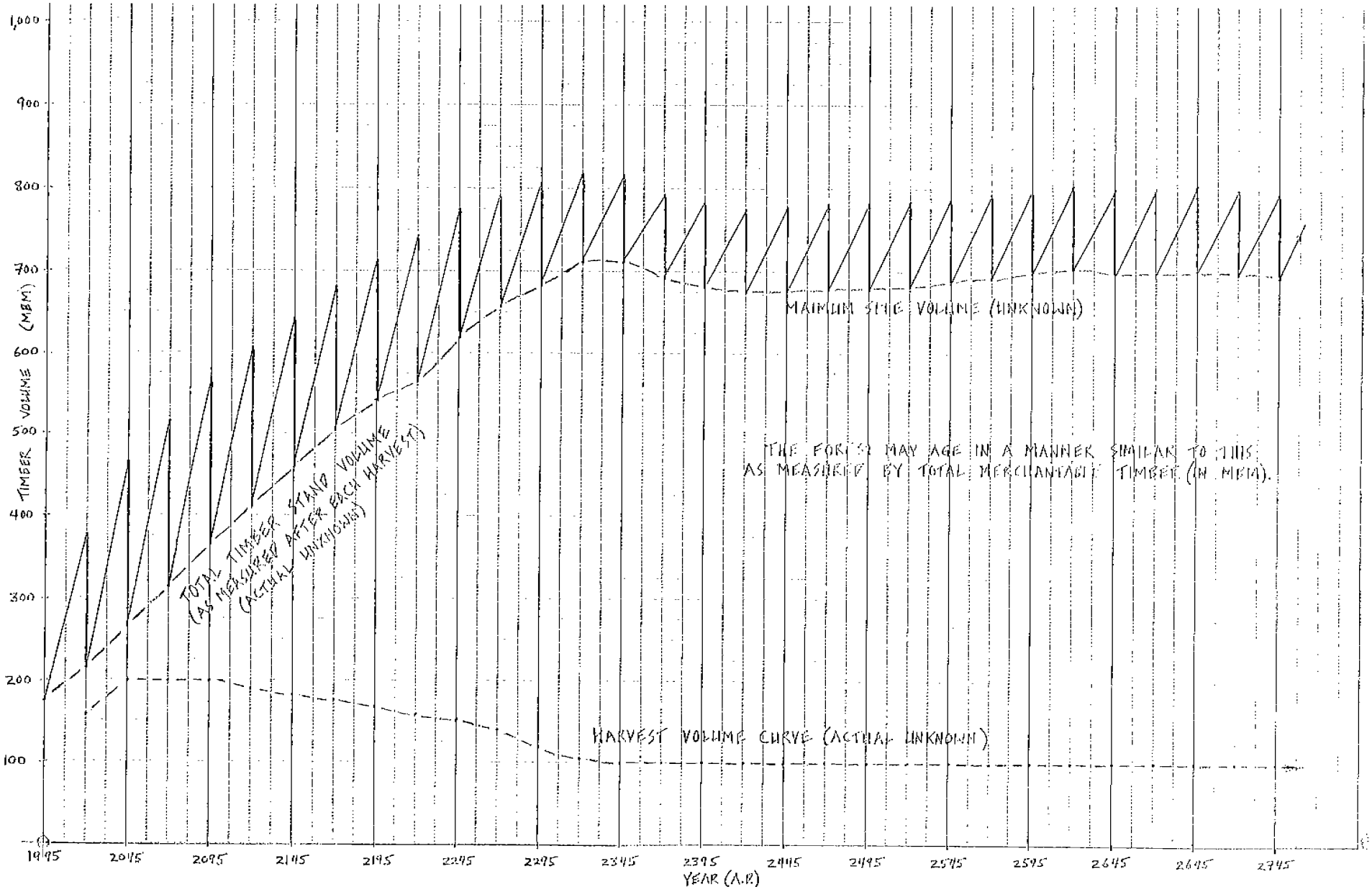
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TIMBER VOLUME (MBM)
TOTAL TIMBER STAND VOLUME (AS MEASURED AFTER EACH HARVEST) (ACTUAL UNKNOWN)
MAXIMUM STAND VOLUME (UNKNOWN)
THE FOREST MAY AGE IN A MANNER SIMILAR TO THIS AS MEASURED BY TOTAL MERCHANTABLE TIMBER (IN MBM).
HARVEST VOLUME CURVE (ACTUAL UNKNOWN)
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